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Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510 New York, New York 10165

sisaacson@faillacelaw.com

Telephone: (212) 317-1200 Facsimile: (212) 317-1620

December 17, 2018

VIA ECF & ELECTRONIC MAIL

Honorable Katherine Polk Failla United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Failla_NYSDChambers@nysd.uscourts.gov

Re: Ortega Hernandez, et al. v. Muzzarella Inc., et al 17-cv-6164 (KPF)

Dear Judge Failla:

I am an attorney with the office of Michael Faillace & Associates, attorneys for Plaintiff in the above-referenced matter. We write, with the consent of Defendants' counsel, to respectfully request an extension of time to file the parties' joint pretrial order, jury charge requests and proposed voir dire questions, which are presently due on December 24, 2018. This is the first request of its kind. The reason for the request is that the undersigned will be on vacation until December 25, 2018. The undersigned emailed Plaintiff's proposed documents to defense counsel on December 3, 2018 in order to try to submit these documents before leaving on vacation; however, Defendants' counsel has indicated that they will not be able to review Plaintiff's proposed documents before I leave. Accordingly, Plaintiff respectfully requests a brief extension of time to submit these documents from December 24, 2018 to December 26, 2018.

The parties thank the Court for its attention to this matter.

/s/Sara Isaacson
Sara Isaacson

Respectfully Submitted,

cc: Jason Mizrahi, Esq. (via ECF) Joshua Levin-Epstein, Esq. (via ECF)